

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

**Re: ECF Nos. 18602, 21005, 22400,  
22682, 22736**

(Jointly Administered)

**STATUS REPORT CONCERNING  
COMMUNITY HEALTH FOUNDATION OF P.R. INC.'S MOTION FOR  
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Commonwealth’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> and Community Health Foundation of P.R. Inc. (“CHF” and, together with the Oversight Board, the “Parties”), respectfully submit this

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Building Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

joint status report relating to *Community Health Foundation of P.R. Inc.’s Motion for Allowance and Payment of Administrative Expense* [ECF No. 18602] (the “Motion”), stating as follows:

**Status Report**

1. Pursuant to the Court’s *Order Setting Deadline for a Status Report Concerning Community Health Foundation of P.R. Inc.’s Motion for Allowance and Payment of Administrative Expense* [ECF No. 22682] (the “Order”), on October 28, 2022, the Parties filed a *Joint Status Report Concerning Community Health Foundation of P.R. Inc.’s Motion for Allowance and Payment of Administrative Expense* [ECF No. 22736] (the “Status Report”). As requested in the Order, the Status Report laid out the Parties’ positions regarding the issues that remained in dispute in connection with the Motion, the documents and information necessary to resolve those issues, and the Parties’ proposed schedule for exchanging such documents and information. The Status Report also requested that the Motion be adjourned from the November 2, 2022 omnibus hearing to the December 14, 2022 omnibus hearing. *Id.* ¶ 11.

2. Since the Status Report was filed, CHF has collected and provided to the Oversight Board the documents and information described in paragraphs 5 through 7 of the Status Report. The Parties also entered into the agreement contemplated by paragraph 8 of the Status Report governing the confidentiality of such documentation. The Oversight Board and its advisors are currently in the process of analyzing these documents to determine what CHF’s PPS rate should be for the years 2020 and 2021, what wraparound payments, if any, are owed to CHF, and whether any additional information is needed from CHF to complete their analysis. The Oversight Board and its advisors are also in the process of reviewing documentation provided by the Puerto Rico Department of Health and the Puerto Rico Health Insurance Program discussed in paragraphs 9 and 10 of the Status Report.

3. In order to allow the Oversight Board and its advisors to complete this analysis, the Parties respectfully request that the hearing in connection with the Motion be adjourned to the Omnibus Hearing scheduled for February 1, 2023.

*[Remainder of page intentionally left blank]*

Dated: November 29, 2022  
San Juan, Puerto Rico

Respectfully submitted,

**O'NEILL & BORGES LLC**

By: /s/ Hermann D. Bauer  
Hermann D. Bauer  
USDC No. 215205  
250 Muñoz Rivera Ave., Suite 800  
San Juan, PR 00918-1813  
Telephone: (787) 764-8181  
Facsimile: (787) 753-8944  
Email: hermann.bauer@oneillborges.com

**PROSKAUER ROSE LLP**

By: /s/ Brian S. Rosen  
Martin J. Bienenstock\*  
Brian S. Rosen\*  
Julia D. Alonzo\*  
Eleven Times Square  
New York, NY 10036  
Telephone: (212) 969-3000  
Facsimile: (212) 969-2900  
Email: mbienenstock@proskauer.com  
      brosen@proskauer.com  
      jalonzo@proskauer.com

\* admitted *pro hac vice*

*Attorneys for the Financial Oversight and  
Management Board and as Representative of the  
Commonwealth*

**CORDOVA-AYUSO LAW OFFICE  
LLC**

By: /s/ Lucas A. Córdova-Ayuso  
Lucas A. Córdova-Ayuso, Esq.  
USDC-PR No. 226805  
P.O. BOX 194021  
San Juan, PR 00919-4021  
Tel.: (787) 230-0463  
Email: lac@calawpr.com

*Counsel for Community Health Foundation  
of P.R. Inc.*